

(5)

James A. Byrne  
 United States Court House  
 601 Market St.,  
Phila, Pa 19106

C.CPlaintiff:Date: December 12, 2024

- 1) Corey A. Dick #121136  
 1730 S. Easton Rd.  
 Doylestown, Pa 18901

Defendants:

- 1) PrimeCare Medical Inc  
 3940 Locust Ln.  
 Harrisburg Pa 17109

v.

= Civil Action: Medical Malpractice,  
 Gross Negligence, Physical Pain /  
 Suff. (past, present, future), Mental  
 Pain / Suff. (past, present, future) and  
 Tortious Interference w/ Life; Action  
 Civil Suit =

- 2) Bucks County Correctional Facility (BCCF)  
 1730 S. Easton Rd.  
 Doylestown, Pa 18901

- Civil lawsuit; Petitioner Seeking Damages;  
 Med. Mal; Gross Negligence; Physical Pain / Suff.  
 (past, present, future; Mental Pain / Suff. (past,  
 present, future) and Tortious Interference w/ Life -

• I, Corey A. Dick #121136, am the Plaintiff and Petitioner in the above captioned matter. I am currently incarcerated at the Bucks County Correctional Facility, located at; 1730 S. Easton Rd in Doylestown, Pa 18901 and have been

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... so since 11-19-2024.

- 1) I, Corey A. Dick #121136, was incarcerated at (BCCF), located at 1730 S. Easton Rd, in Doylestown Pa 18901, from 2/20/23 - 9/22/24, during which time the injury underlying this claim occurred.
- 2) On or about 2/20/23, I was arrested on a warrant and new charges, by the PA State Troopers. After the arrest and attempted booking at the Dublin State Police Barracks, I was then handed over to the custody of the Bucks County Sheriff's, at which point, I was transported to the Bucks County Correctional Facility, located at 1730 S. Easton Rd. in Doylestown Pa, 18901 pending V.O.P w/ uncurred charges and I so remained in their custody until my release on 9/22/23.
- 3) Upon my arrival to (BCCF) on 2/20/23, located at, 1730 S. Easton Rd. in Doylestown Pa, 18901, I submitted a request to be seen by the Facilities Dentist \* (Name Unknown) \*, who was employed by PrimeCare Medical Inc., who's corporate office is located at; 3940 Locust Ln in Harrisburg Pa, 17109, furthermore, who was subcontracted by (BCCF) located at; 1730 S. Easton Rd in Doylestown Pa 18901, to act solely in the capacity as the Dentist for the entire population of incarcerated persons.
- 4) On February 27, 2023, I Corey A Dick #121136, was called down to the Facilities Medical Department, as per my request, where it was determined that I would need (2) teeth extracted, from the upper-right side of my mouth, and furthermore, that I would have the procedure done that day. \* (usually ONLY (1) tooth per visit can be pulled) \*

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-5) At some point during the procedure, I heard and felt, what sounded like a "cracking-whip", and after the very audible crack, I immediately felt a sharp, stabbing pain shoot through my entire face. I screamed it hurt so bad! The Dentist said to me, "everything is fine, but she was a tough one to get out though!"

\*( During this operation, I was under local anesthesia, numbing medicine)\*

-6) After the procedure was complete, I was sent back to my Housing Unit, to start antibiotic treatment to battle/prevent possible infections.

-7) About approximately (3-4) weeks post-extraction, I returned to the facilities Medical Department, in severe pain and discomfort. I was evaluated by the same Dentist who operated on me back on 2/27/23, who concluded... after further visual examination and another X-ray of my recently operated on mouth/face, that, "everything looks fine and you're healing up nicely. You'll be fine in a few more weeks." I was then started on another round (2nd) of antibiotics since the procedure.

-8) After approximately a week or so, after the follow up, I start to notice a "green-brown fluid", a mucus type of fluid, was soaked into the medical gauze when I'd go to change it out. At times, it would release/drain into my mouth at random, causing me to be sick, to violently throw up, due to constant nausea, and it became very painful to eat and drink anything.

-9) Wherefore, I submitted another sick call request slip, to see the Dentist, as I was beginning to feel as if something was very wrong, due to the pain and worsening infection.

-10) I was then called down to the medical Department, again, to be seen by the same dentist who operated on me in February, who then ~~took~~ <sup>took</sup> more x-rays of the extraction site and did another visual examination, whereupon he concluded and admitted that he had errored. A mistake, that resulted in the breaking and removal of a bone-fragment from my face\* (from the upper jaw bone on the right side)\* A fragment disposed of via the trash, without my knowledge or consent!

-11) He then informed me that, "he couldn't correct it himself and that I would be scheduled for an (O.A) or Outside Appointment with an Oral Surgeon who would discuss my options for "corrective surgery". It was at this point I began to really fear, that it (the defect) would never heal correctly. He sent me to my housing unit with a new antibiotic prescription for "prednizone", a once-a-year antibiotic, to help combat the worsening infection.

-12) Over the next few months, I was left to deal with a constantly worsening and growing infection to my mouth and face, due to the error and misconduct of the Facilities Dentist (who was subcontracted from his employer to the Bucks County Correctional Facility), ... located at 3940 Locust Ln, in Harrisburg, Pa 17109, his employer being one; PrimeCare Medical Inc. An infection, caused by the direct actions of the BCCF Dentist, resulting in a injury to my person. An injury that I was not informed of when it occurred, but only after many weeks, was it finally revealed that an error was made during the operation on 2/27/23. Having no regard for my safety, health and well-being.\* (the bone-fragment was hidden from me and then disposed of via the trash)\*

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-13) On or about July 18<sup>th</sup>, 2023, I was escorted out of BCCF, by (2) C.O.s (Corrections Officers) -1) C.O. Brannigan, -2) C.O. (Unknown), to meet with an Oral Surgeon, at the Oral Surgery Group, located at 103 Progressive Dr, in Doylestown, Pa 18901.

-14) At this visit with the oral surgeon, I was physically/visually examined and I also took X-rays of my mouth, (upper-right side, where injury was) so they could see the underlying bone-structure, followed then by a cat-scan, meant to determine if in fact, my mouth/face were infected. After all of the examinations were complete, it was determined by the Oral Surgeon, that an injury/defect was very evident, due to the error/misconduct during the tooth extractions. And that I would need "future", "invasive" surgery to only attempt to correct the defect. And after reviewing the X-rays and cat-scans, it was "plain as day" that a "massive" infection was present throughout the entire right side of my face and neck area, and it was caused by the defect/injury sustained in February, 2023, at the hands of the Dentist employed at BCCF, by and through his employer, PrimeCare Medical Inc. \*(an 11.1 mm size bone-fragment was removed and disposed of on 2/27/23)\*

-15) After July's visit to the Oral Surgery Group, located at, 103 Progressive Dr. in Doylestown Pa, 18901; I was returned to the, "care, custody and control" of BCCF, located at; 1730 S. Easton Rd in Doylestown Pa 18901.

-16) Over the next month or so, I suffered daily from the massive, growing infection and constant drainage, that was making me sick regularly. It was hard to eat at all, due to the pain and furthermore, the debris getting caught in the opening from the now missing bone-fragment, (11.1mm), never allowing it to recover from the infection or to heal properly.

-17) On or about Aproximately, August, 20 2023, I was escorted to yet another (O.A) outside appointment, by (2) Unknown Corrections Officers from BCCF, to an appointment with Pinnicale E.No.T., located at; 599 W. State St. in Doylestown, Pa 18901.

-18) At this appointment with Pinnicale E.No.T (Ears, Nose, Throat) I was again, visually examined by one of the Surgeons who would possibly be doing the upcoming corrective surgery, who went on to explain his plan to "attempt" to fix the Dental error from BCCF's Dentist. He informed me that he would then go on to cordinate with BCCF, to schedule a date for Corrective Surgery.

-19) I was granted a "Motion to Order", from a Doylestown Judge at the Doylestown Court House, directing the Medical Staff, or PrimeCare Medical Inc., to turnover my medical records, in its entirety, but was denied said motion or access to them, until the day I was released.

-20) A few days prior to my release on 9/22/23, I was called down to the Medical Department at BCCF, where I was informed that a date had been set for corrective surgery \* (I believe ~~it was~~ it was 9/28/24) \* Wherefore, I was then informed that if I left before my set date for surgery, that PrimeCare was no longer going to pay for my corrective surgery and reason being, that if I left the jail, that in and of itself, released PrimeCare Medical Inc. from being liable and therefore, released them and voiding any obligation to pay for said surgery.

-21) I was released on parole, on 9/22/23, and as of this "motion to seek

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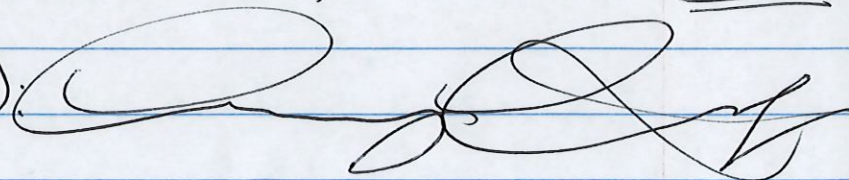
in damages," I still have not received corrective surgery, as I can't afford to pay out of pocket and my state insurance doesn't cover it.

- 22) After my release on 9/22/23, while at my home, located at; 929 S. Old Bethlehem Pike in, Sellersville, Pa 18960, I phoned Doylestown Hospitals - Pinnacle ENT, to inquire if I was still scheduled for surgery. I was indeed scheduled but would need to bring, in full, the cost of the operation as Prime - Care Medical Inc had pulled their funding upon my release on 9/22/23.

• Wherefore, I, the Plaintiff and Petitioner, Corey A. Dick #121136, hereby demands and is seeking damages, both jointly and severally, in the amount not to exceed \$10,000,000.00, to also include the costs and fees associated with filing this motion (pro-se) for; Med Mal, Gross Neg, Phy Pain/Suff (past, present, future) Ment Pain/Suff (past, present, future), Tortious Interference w/ life.

Respectfully Submitted, 12/12/24  
by: Corey A. Dick #121136 (Pro-se)

C.A.

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James A. Byrne -  
United States Court House  
601 Market St.  
Phila, Pa 19106

C, e

Plaintiff:

Date: December 12, 2024

- 1) Corey A. Dick #121136  
1730 S. Easton Rd.  
Doylestown Pa 18901

Defendants:

- 1) PrimeCare Medical Inc.  
3940 Locust Ln.  
Harrisburg, Pa 17109  
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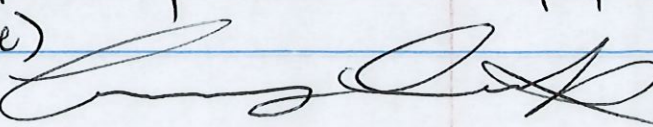
- 2) Berks County Correctional Facility (BCCF)  
1730 S. Easton Rd.  
Doylestown, Pa 18901

V.

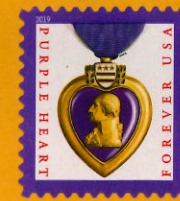
• = Civil Action; Medical Malpractice,  
Gross Negligence, Physical Pain/Suff.  
(past, present, future), Mental Pain/Suff  
(past, present, future) Tortious Inter-  
ference w/ Life; Action, Civil Lawsuit =

- Verification of Information -

• I, the Plaintiff and Petitioner, Corey A. Dick #121136, hereby swear and affirm and to the best of my knowledge, that all information contained herein, is true and correct, wherefore, I so represent and present them as facts and so respectfully request they be accepted and viewed as such.

Respectfully Submitted, 12/12/24  
by: Corey A. Dick #121136 (Pro-Se)  
(X): 

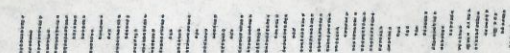
Corey A. Dick #121136 (Pro-se)  
Bucks County Correctional Facility  
1730 S. Easton Rd.  
Doylestown, Pa 18901



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— Civil Division —  
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Philadelphia, Pa 19106

U.S.M.S.  
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